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May 11, 1999

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Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Re: Docket No. 98N-1038, labeling of irradiated foods

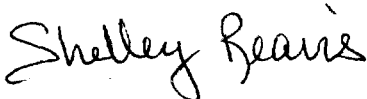
As a consumer of organic products, I am encouraged by the invitation from the FDA to comment on irradiation in the production, processing, and handling of food. Labeling of irradiated foods is an issue that warrants our attention, because clear and prominent labeling gives shoppers a choice based on appropriate and truthful information.

I support the FDA's initial regulation, which required the labeling of retail packages or displays of foods treated with ionizing radiation include both the radura logo and a disclosure statement, in addition to information required by other regulations. I do not agree with the FDA's amended labeling for irradiated foods, which does not require that a radiation disclosure statement be any more prominent than the declaration of ingredients. As initially stated, the current radiation disclosure statement conveys meaningful information to consumers in a truthful and nonmisleading manner.

The wording of such a label should be clear and as simple as possible to avoid confusion or alarm. Language such as "cold pasteurization" (irradiation) is confusing and misleading, since pasteurization is an entirely different process involving heating and cooling as we know it. A brief description of the type of ionizing radiation used should be required, including an address or telephone number for further questions. Until the public is better informed, I believe it is too soon to determine a specific date of expiration for the use of a radiation disclosure statement.

In closing, I thank the FDA for encouraging comments regarding labeling in the use of radiation, such as cesium 137 and cobalt 60, to kill bacteria on foods. I encourage the FDA to continue to prominently label irradiated foods, identifying all irradiated components of food. Since irradiation can alter the texture, taste, shelf life, and nutrients of a food, the consumer has the right to be informed. As an informed consumer, it is my preference to purchase food that is grown according to the strictest qualities insured by organic standards.

Sincerely,



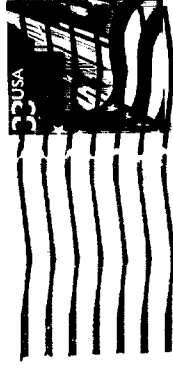
Shelley Reavis

c California Senators Barbara Boxer and Diane Feinstein
U. S. Congressperson Sam Farr
Eileen Stommes, Deputy Administrator

98N-1038

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